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August 1, 2025

Re: *Foley, et al., v. Union de Banques Arabes et Françaises*, No. 22-cv-1682-ER

Hon. Edgardo Ramos  
U.S. District Judge  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

Dear Judge Ramos:

We write on behalf of Union de Banques Arabes et Françaises (“UBAF”) in the above-captioned litigation to request permission to file under seal: (i) UBAF’s memorandum of law in opposition to Plaintiffs’ motion for partial summary judgment (the “Opposition”); (ii) UBAF’s responses to Plaintiffs’ Rule 56.1 statement of material facts; (iii) the declaration of Ben S. Kaminetzky, and exhibits thereto, in support of the Opposition; and (iv) the declaration of Valérie Mayer regarding the application of French law, and appendix thereto, in support of the Opposition (“UBAF’s Opposition Materials”).

UBAF’s Opposition Materials contain information that has been designated as Confidential under the Stipulated Protective Order entered in this action on January 22, 2024 (Dkt. No. 64), and reference the identity or suggested identity of one of UBAF’s customers. As French law prohibits disclosing client confidences, such as client identities, to third parties, see Decl. N. Lenoir, Dkt. No. 81 at 27, UBAF requests that such information be redacted and filed under seal in court filings. See *Strauss v. Credit Lyonnais, S.A.*, 2011 WL 4736359, at \*5, \*8 (E.D.N.Y. Oct. 6, 2011) (sealing information regulated by the same French law, including the identity of the French bank’s customers); see also *Dodona I, LLC v. Goldman, Sachs & Co.*, 119 F. Supp. 3d 152, 156 (S.D.N.Y. 2015) (sealing “identities of [party and non-party financial institutions’] customers”).

Pursuant to Your Honor’s Individual Practices, the Court’s ECF Rules & Instructions, and the Court’s Order dated July 7, 2025 (Dkt. No. 116), UBAF’s Opposition Materials are filed herewith entirely under seal, and UBAF will file, within 30 days after the parties’ briefing on Plaintiffs’ motion for partial summary judgment is complete, UBAF’s Opposition Materials with any redactions on the public docket and a second complete set of the same, with any redactions highlighted, under seal, as required by Section 6.8 of the Court’s ECF Rules & Instructions.

Respectfully Submitted,

/s/ Ben S. Kaminetzky

Ben S. Kaminetzky

cc: All Counsel (via ECF)

**MEMO ENDORSED**

The motion to file the documents under seal is granted. SO ORDERED.



Edgardo Ramos, U.S.D.J.

Dated: August 4, 2025

New York, New York